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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

In Re Subpoena Of

Top Rank, Inc. and Robert Arum

Cung Le, Nathan Quarry, and Jon Fitch, on  
behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-PAL

**PLAINTIFFS' MOTION FOR  
LEAVE TO LODGE MATERIALS  
UNDER SEAL RE PLAINTIFFS'  
REPLY IN SUPPORT OF MOTION  
TO COMPEL PRODUCTION OF  
DOCUMENTS RESPONSIVE TO  
THEIR SUBPOENA TO THIRD  
PARTY TOP RANK, INC. AND  
MOTION TO COMPEL  
ATTENDANCE AT DEPOSITION  
OF ROBERT ARUM, PRESIDENT  
OF TOP RANK, INC.**

1 Pursuant to Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Local Rule  
2 10-5(a), and Section 14.3 of the Revised Stipulation and Protective Order (the “Protective  
3 Order”) issued by this Court on February 10, 2016 (ECF No. 217 at 15), Plaintiffs Cung  
4 Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury  
5 on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”) hereby  
6 move this court for leave to lodge certain documents under seal related to their Reply in  
7 Support of Motion to Compel Production of Documents Responsive to Their Subpoena to  
8 Third Party Top Rank, Inc. and Motion to Compel Attendance at Deposition of Robert  
9 Arum, President of Top Rank, Inc. (the “Reply Brief”).

10 Under Section 14.3 of the Protective Order, documents designated Confidential or  
11 Highly Confidential –Attorneys’ Eyes Only “shall be provisionally lodged under seal with  
12 the Court, and redacted papers shall be publicly filed. Within 5 days of the materials being  
13 lodged with the Court, the Party claiming protection shall file motion to seal setting forth  
14 the bases for sealing and proper authority under *Kamakana v. City & County of Honolulu*,  
15 447 F.3d 1172 (9th Cir. 2006), or some other applicable authority.” Accordingly,  
16 Plaintiffs seek leave to lodge the following documents under seal. Following expiration of  
17 the twenty-one day period provided for in Section 5.2(b) of the Protective Order, a motion  
18 to unseal portions of the Reply Motion shall be filed.

19 First, Plaintiffs seek leave to lodge under seal portions of the Reply Brief which  
20 contain materials that have been designated as confidential.

21 Second, Plaintiffs seek leave to lodge under seal Exhibits 2-15 of their Reply  
22 Motion, which contain a discovery response provided by Defendant Zuffa, LLC, and  
23 deposition transcript excerpts which have been marked confidential, highly confidential,  
24 or are still in the period of review pursuant to Section 5.2(b) of the Protective Order.

25 Plaintiffs have filed all of these documents under seal, in accordance with the  
26 Court’s ECF system, with the instant Reply Motion. Plaintiffs have publicly filed  
27

1 placeholders for redacted versions of these documents with the Court, and will serve un-  
2 redacted versions of these documents on Defendant.

3 DATED: August 31, 2017.

4 WARNER ANGLE HALLAM JACKSON  
5 & FORMANEK PLC

6 By: /s/ Robert C. Maysey

7 Robert C. Maysey

8 Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2017, I electronically transmitted the PLAINTIFFS' MOTION FOR LEAVE TO LODGE MATERIALS UNDER SEAL RE PLAINTIFFS' REPLY IN SUPPORT OF MOTION TO COMPEL PRODUCTION OF DOCUMENTS RESPONSIVE TO THEIR SUBPOENA TO THIRD PARTY TOP RANK, INC. AND MOTION TO COMPEL ATTENDANCE AT DEPOSITION OF ROBERT ARUM, PRESIDENT OF TOP RANK, INC. to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all registered users, and also served the same by mailing a copy of the redacted filings via certified mail on the following, who are not registered participants of the CM/ECF System:

David Marroso, Esq.  
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/s/Teresa Baldrige

Teresa Baldrige, an Employee of Warner  
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